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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 26 1995

REPLY TO THE ATTENTION OF

HSE-5J

MEMORANDUM

DATE:

SUBJECT: ACTION MEMORANDUM- Request for a Removal Action at the North Shore Group Site, in Chicago, Cook County, Illinois

From: Steven J. Faryan, On-Scene Coordinator,
Emergency Response Section II

Thru: Rick Karl, Chief
Emergency and Enforcement Response Branch

TO: William E. Muno, Director
Office of Superfund

Site ID#: VE

I. PURPOSE:

The Purpose of this Action Memorandum is to request that you approve funds in the amount of \$ 252,500 to conduct a time critical removal action at the North Shore Group property at 1420 W. 38th Street in the City of Chicago, County of Cook, State of Illinois. The site was referred to the U.S. EPA by the City of Chicago, Department of Environment, as a Brownfields Initiative, and the building is set for demolition in the Fall of 1995. A time critical removal action is necessary to abate the imminent and substantial endangerment to public health and the environment due to the storage of poisonous gas and liquids, banned pesticides and herbicides, and drums of flammable liquids, abandoned in this building which is rapidly deteriorating structurally. The time critical removal action will involve the securing, sampling, staging and disposal of the poisons, herbicides, pesticides, and flammable liquids. A time critical removal action is necessary to abate the immediate threats to human health and the environment due to the structural deterioration of the building and threats of vandalism and arson to the building.

The Site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND:

A. SITE DESCRIPTION:

CERCLIS ID # IL0001206150

1. Removal Site Evaluation:

OSC Faryan and Technical assistance Team (TAT) members Ragu Nagam, Dave Hendron, and Tim Calloway conducted a Site Inspection at the abandoned building on June 6, 1995. The site gates and fence and doorways were found unsecured and evidence of vandalism, gang meetings, and salvaging of chemicals and apparatus in the building were apparent. The OSC and TAT conducted a reconnaissance of the building interior in Level B personnel protection to conduct an inventory of the hazardous substances and hazardous wastes found in the building.

The basement was found to contain numerous poisonous and highly toxic compounds including pesticides, herbicides, insecticides and poisonous gas cylinders, Methyl Bromide, and packages of Cyanogas (Attachment A- Chemical Inventory). Many of the containers were opened, overturned and in deteriorating condition. The photoionization detector (PID) showed elevated readings near the location of the containers. Several releases of the contents of the containers were also evident during the inspection.

The first floor of the building contains numerous containers of pesticides, herbicides, poisons and 19 drums of flammable liquids. Wood Pallets and furniture were observed throughout the property indicating the potential and possible plan for arson.

On the outside of the building at least one underground storage tank was observed. The tank was unable to be sampled during the site investigation.

The OSC and TAT members purchased locks and chains to secure the site and notified the City of Chicago to proceed with an additional board up procedure at the site. The OSC also requested the City of Chicago to make all notifications to the Police, Fire and Health Departments as to the highly toxic and poisonous materials inside the building.

The City of Chicago, Department of Environment referred this site to the U.S. EPA in June of 1995 as a Brownfields initiative because the building is structurally deteriorating and is set for

demolition in the Fall of 1995.

2. Physical Location and Site Characteristics:

The Building is located in an industrial area which borders the Chicago River at 1420 W. 38th Street in Chicago, Illinois (Attachment B). The building was unsecured at the time of the site inspection on June 6, 1995. The outside of the building is in very poor condition and bricks were observed to have fallen to the street from the upper floors which are continuously collapsing.

There is limited history concerning the use of the building. The property is apparently for sale or owned by Northwest Liquidators, North Shore Group I, North Shore Whse et al, of Northbrook, Illinois. One report from the City of Chicago indicates that Dash Investment Corp is said to have purchased the property through tax delinquent auction. It is not known who possesses the title to the property at this time. A title search has been ordered and is still pending.

3. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

The release or threat of release of hazardous substances and hazardous wastes was documented through pictures and through field notes. In addition, the Site Inspection Report documents the deteriorating conditions at the site and the inventory of all the hazardous substances and hazardous wastes found abandoned in the building.

The real threat of vandalism, and potential for arson would severely compound the threats of the highly toxic and poisonous compounds found abandoned at this facility. A fire at the facility would cause the release of highly poisonous gases that would potentially impact the residential neighborhood which lies only 1 block to the West. In addition, any run-off from the site would impact the Chicago River which lies 100 feet to the East and would severely impact the sewer system operated by the Metropolitan Water Reclamation District.

B. Other Actions to Date

1. Previous Actions:

The City of Chicago, Department of Environment and City of Chicago, Fire Department, Hazardous Incident Team, and Illinois Environmental Protection Agency, have had involvement with the site since May of 1993 when a joint inspection was conducted at the abandoned property. The inspection conducted by the above

agencies determined that the abandoned building did contain hazardous and toxic chemicals and therefore there was a need to secure the building. IEPA was willing at this time to conduct the cleanup if no Potentially Responsible Party was found to fund the clean-up and disposal of the compounds found. The City of Chicago did secure the site on May 26, 1993.

The City of Chicago, Department of Environment, and Illinois Environmental Protection Agency, have had involvement with the site since May of 1993. At that time an inventory was conducted of the chemicals abandoned in the building, and the site was secured. The Department of Environment and IEPA also had previous cases with the suspected owners of this facility in 1991. The same pesticides, herbicides, and poisons found at this site were found in a container and building at 3550 S. Morgan back in March of 1991. The owner, Mr. Patrick Hughes and North Shore Distributors were ordered to stop sale and use of these banned pesticides and herbicides by the Illinois Department of Public Health.

In addition, the owners were notified that the pesticides and herbicides were to be properly disposed of according to all applicable disposal regulations and that the IEPA shall be contacted prior to and during the transportation of these hazardous substances. Apparently neither, the IEPA or the Illinois Department of Public Health were notified when the hazardous substances were moved from the site. It is suspected that the banned pesticides, herbicides, poisons and flammable compounds were moved over and abandoned at the 1420 W. 38th Street Building. All of the compounds found at the 3550 S. Morgan building are presently found at the 1420 W. 38th St building, indicating that this illegal transfer and abandonment took place.

2. Current Actions

A hearing has been held by the City of Chicago and approval was given to demolish the building in the Fall of 1995.

C. STATE AND LOCAL AUTHORITIES' ROLES:

1. State and Local Actions to Date:

The City of Chicago, Department of Environment has referred this site to the U.S. EPA as part of the Brownfields initiative. The building is set for demolition in the Fall of 1995.

The IEPA and City of Chicago do not have adequate funding or resources to conduct the removal of the pesticides, herbicides and flammable liquids at this abandoned property. The IEPA and City of Chicago will continue to provide support to U.S. EPA during the removal efforts.

2. Potential for Continued State and Local Response:

The City of Chicago and IEPA do not have adequate financial resources to provide clean-up at this facility. The City of Chicago will continue to provide police security and periodic checks on the property and has held a hearing to demolish the building in the Fall of 1995.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES:

A. THREATS TO PUBLIC HEALTH OR WELFARE:

Conditions observed and documented at the North Shore Group site constitute a threat to human health and the environment and meet the criteria for a time critical removal action as outlined in Section 300.415 (b)(2) of the National Contingency Plan (NCP) specifically:

- a) Actual or Potential exposure to nearby human population, animal, or food chain from hazardous substances or contaminants:

Potential exposure of nearby populations to hazardous materials exists at the site due to the lack of security at the property and ease of access to the property and building. Past incidents of trespassing and scavenging have been reported to and documented by the City of Chicago. Evidence and materials exist for arson at the abandoned building. Numerous flammable drums are staged on the first floor along with pallets and wood desks to act as the fuel. The basement contains evidence of scorched floors and walls indicating arson may have been attempted. If a fire erupted, thousands of residents and neighboring businesses would have to be evacuated due to the toxic and poisonous atmosphere which would be released from the incomplete burning of the hazardous substances and wastes found in this building.

- b) Hazardous Substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release;

Over 250 containers that are classified as extremely toxic or poisonous and banned pesticides and herbicides are improperly stored and abandoned inside the building. The compounds are listed in Table 1 and include DDT, Chlordane, Lindane Pyrethrin, Methyl Bromide and Calcium Cyanide. Many of the containers are opened, leaking their contents onto the ground.

c) Threat of Fire or explosion;

Numerous drums containing flammable liquids were found on the first floor of the building, including; 14- 55 gallon drums of methyl alcohol, 5-55 gallon drums of isopropyl alcohol and numerous other small containers of paints and solvents. Although these drums appear in good condition, the contents of the drums could be used as accelerant in an arson attempt on the building. Evidence of fires started in the building were present in the basement. The building contained large amounts of ignitable paper and wood which appeared to be piled so as to fuel an arson fire. If the materials found in the building were to burn, numerous first responders may be exposed to extremely toxic and poisonous gases resultant from the fire. In addition, employees from the neighboring industrial district and residential neighborhood would be within the potential impact of such a toxic plume.

d) Availability of other appropriate federal or state response mechanisms to respond to the release;

The Illinois Environmental Protection Agency and City of Chicago referred this site to the U.S. EPA as a brownfields initiative. The IEPA and City of Chicago do not have the personnel or financial resources to clean up this site. The City of Chicago will however provide the funds to demolish the building once the contaminants are removed. The demolition is set for the Fall of 1995.

B. THREATS TO THE ENVIRONMENT:

In the event of fire or arson at the facility, the Chicago River which lies immediately across the street from the facility would be adversely impacted by any fire fighting run-off water which would be highly contaminated with pesticides and herbicides and poisons.

In addition, any fire fighting runoff would greatly impact the Metropolitan Water Reclamation District sewer system which receives the water from this area. The pesticides, herbicides and poisons would affect the sewage treatment plant, and could potentially contaminate any sludge generated at the facility.

IV. ENDANGERMENT DETERMINATION:

Actual or threatened releases of hazardous substances, pollutants or contaminants from this site and as addressed in Sections II and III above, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS:

A. PROPOSED ACTIONS:

1. Proposed Action Description:

This time critical removal action will be comprised of the following actions:

- a) develop and implement a site safety plan
- b) secure the site and provide 24 hour armed security
- c) Stage, sample, and dispose of the drums, containers, hazardous and non-hazardous debris, decon water, in accordance with the U.S. EPA off site rule (58 C.F. R. 49200)
- d) Decontaminate the building and contents that are clearly impacted by the release of the chemicals found inside and outside the building
- e) Sample soil and the underground storage tank contents and dispose of appropriately
- f) Sample and dispose of soil appropriately after the demolition of the building

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not pose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

2. Contribution to Remedial Performance:

The proposed action will remove all hazardous substances and hazardous wastes. In addition, an Underground Storage Tank will be sampled and removed if appropriate. The City of Chicago will demolish the building in the Fall of 1995. There will be no further action required at this site which is consistent with the long term remedy.

3. Description of Alternative Technologies:

Many of the pesticides and herbicides are banned and are subject to the Land Disposal Restrictions. Most of the chemicals found in the building will have to be incinerated.

4. ARARs:

Federal ARARs determined to be applicable to this site are the Resource Conservation and Recovery Act (RCRA) requirements relating to classifying and disposing of the wastes. All ARARs of federal law will be complied with to the extent practicable. A letter has been sent to the IEPA requesting that they identify State ARARs. Any State ARARs identified in a timely manner will be complied with to the extent practicable.

5. Project Schedule:

The removal action is expected to take approximately sixty work days to complete. Disposal of some of the chemicals may take additional time due to the nature of the wastes involved at this site.

B. ESTIMATED COSTS:

The estimated total cost for the time critical removal action is \$251,075 of which \$208,575 may be used towards the Emergency Response Cleanup Services (ERCS) contractors. The site is projected to take 60 working days to complete. The detailed ERCS contractor costs and Initial Cost Projection to complete work at the site are found in Table 2. The total removal Project Ceiling Cost Estimate is found below.

NORTH SHORE GROUP, CHICAGO, IL.

<u>Extramural Costs:</u>	<u>Project Ceiling</u>
Cleanup Contractor Costs (ERCS)	
Personnel	\$ 50,000
Equipment	\$ 25,000
Other Direct Costs (T & D)	\$ 75,000
Subtotal	\$150,000
20% Contractor Contingency	\$ 30,000
Subtotal	\$180,000
Total TAT Costs	\$ 17,500
Extramural Subtotal	\$197,500
Extramural Contingency (15%)	\$ 30,000
TOTAL EXTRAMURAL COSTS	\$227,500
<u>Intramural Costs:</u>	
U.S. EPA direct Costs [\$30 x (300 hrs + 50 HQ Hrs)]	\$ 10,000
U.S. EPA Indirect Costs [\$53 x 300 hrs.]	\$ 15,000
TOTAL, INTRAMURAL COSTS	\$ 25,000
<u>TOTAL, PROJECT CEILING</u>	\$252,500

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN:

Should the above action be delayed or not taken, residents and Fire and Police personnel from the City of Chicago may potentially be exposed to hazardous substances. The potential for arson and vandalism at the building is very high. Further vandalism or a fire would cause an off-site release to the air, ground and to the Chicago River which will adversely impact the neighboring businesses and employees and the local residential neighborhood.

VII. OUTSTANDING POLICY ISSUES:

None

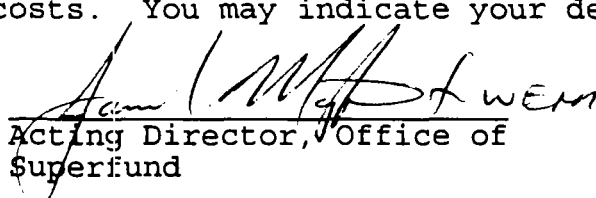
VIII. ENFORCEMENT:

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum (Attachment D).

IX. RECOMMENDATION:

This decision document represents the selected removal action for the North Shore Group site, in Chicago, Illinois, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the Administrative Record for the site (Attachment 2). Conditions at the site meet the NCP section 300.415 (b) (2) criteria for a time critical removal action and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$ 252,500 of which \$210,000 can be used for the cleanup contractor costs. You may indicate your decision by signing below.

(Approval)


Acting Director, Office of
Superfund

(Disapproval)

Acting Director, Office of
Superfund

Attachments:

cc: T. Johnson, OS-210
Don Henne, Regional Environmental Officer
U.S. Department of Interior, Rm 217
200 Chestnut street, Philadelphia, PA 19106
B. Everetts, IEPA
Kevin Stancil, City of Chicago, Department of Environment

bcc: R. Karl, HSE-5J
D. Bruce, HSE-5J
T. Lesser, P-19J
D. Crume, MF-10J
EERB Read File
EERB Delivery Order File (M.E. Gustafson)
EERB Site File (SF Central file Room)
Robert Dumelle, C10-J
Steven J. Faryan, OSC, HSE-5J
S. Vega, SAM, HSE-5J
T. Krueger, ORC
William Ryczek, HSE-5J
L. Fabinski, ATSDR

ATTACHMENT A
CHEMICAL INVENTORY

4.0 ANALYTICAL RESULTS

The following list includes hazardous chemicals or tradenames found at NSG on June 6, 1995. The list is not a comprehensive inventory of chemicals present. The approximate quantity is given for larger quantities. Analytical confirmation was not requested or performed.

First Floor:

methanol, 14 55-gallon drums
isopropanol, 5 55-gallon drums
calcium isochloride, 125 pounds
Kepone ant control powder, numerous 8 ounce jars
Cygon-2E systemic insecticide
Entex, 1 gallon
Pyrethrins
Roost No More, 1 gallon
Entex, 1 gallon
Vapona-4, 5 gallons

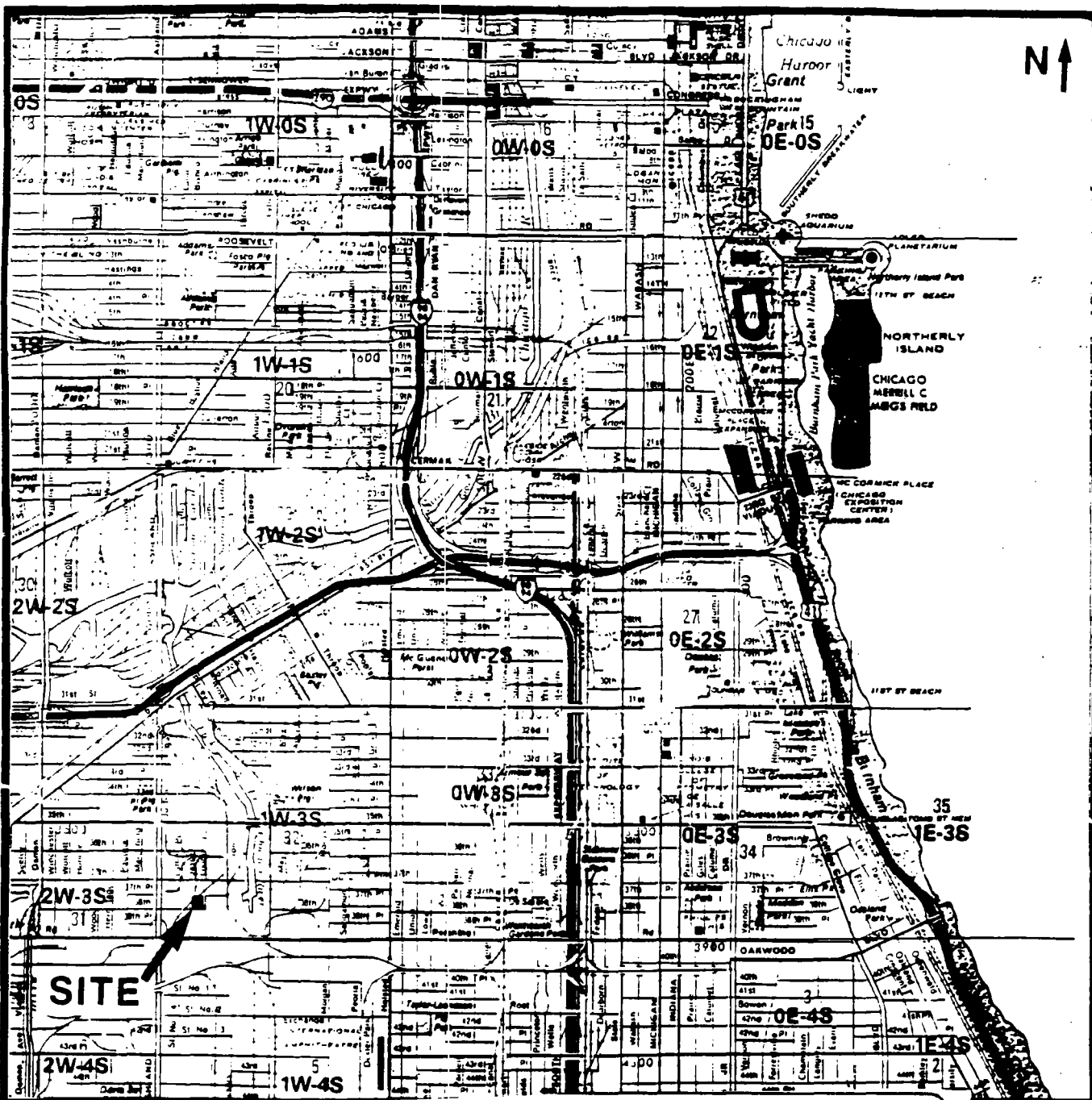
Basement:

calcium cyanide
Talon-G
Ronnel
Dowfume EB-15
Goldcrest C-100 Insecticide
Kelthane
Cyanogas
Hookworm Spray
Elco Roach and Ant Powder

Guardian Chlordane oil solution
Chemagro Entex Insecticide
Sinclair, concentrate insecticide
Lindane
Methyl Bromide
Damatam 40 E Roach Concentrate
Pyrethrins

ATTACHMENT B

SITE MAP



EPA U.S. EPA Region 5
EMERGENCY AND ENFORCEMENT RESPONSE BRANCH

Site Location Map

TITLE

FIGURE #

North Shore Group

1

SITE

SCALE

CITY

STATE

PAN

Chicago, Illinois

SOURCE

DATE

REVISED

ATTACHMENT C
Detailed Cost Summary

DETAILED COST SUMMARY

"Contractor Costs" redacted - not relevant to the selection of the removal action.

Government
Other Direct Costs (ODC)

Page: 1

Projection Name: NORTH SHORE

Date: 06/20/95

Projection Type: Initial

Description	Ctr. Code	Vend Code	Cost Type	Unit Cost	Units	Qty	Task Code	Task Description	Projected Cost	Total Cost
Fuel/Tolls/Misc.	TAT		Materials/Supplies	500.00	Bulk	1.0	06	Administrative	1630	1630
(ODC Totals:)									1,630	1,630

(Including Site Contingency:15.00%)

1,875

Government
Personnel by CLIN

Page: 1

Projection Name: NORTH SHORE
Projection Type: Initial

Date: 06/20/95

CLIN	Job Description	Ctr. Code	Regular Hrs/Day	O.T. Hrs/Day	Regular Rate	O.T. Rate	Qty	No. of Days	Task Code	Task Description	Projected Cost	Total Cost
S1-05-01	On Scene Coordinator	EPA	8.0	2.0	30.00	30.00	1	21	06	Administrative	17325	17325
S4-15-01	Engineer / Civil	TAT	8.0	2.0	35.00	35.00	1	21	06	Administrative	23961	23961
S4-30-01	Ind Hygenist/Safety	TAT	8.0	2.0	35.00	35.00	1	10	06	Administrative	11410	11410
(Personnel Totals:)											52,696	,696

(Including Site Contingency:15.00%)

60,600

Enforcement Sensitive
September 18, 1995

ATTACHMENT D
ENFORCEMENT CONFIDENTIAL ADDENDUM

ENFORCEMENT ADDENDUM

Redacted - not relevant to the selection of the removal action.

ATTACHMENT E
U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
NORTH SHORE GROUP SITE

CHICAGO, ILLINOIS

SEPTEMBER 19, 1995

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
00/00/00	Ecology & Environment, Inc.	U.S. EPA	Site Assessment Report (Pending)	
00/00/00	Faryan, S., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum (Pending)	26